

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

A.P. MØLLER-MAERSK A/S, TRADING :
AS MAERSK LINE and MAERSK LINE A/S :
Plaintiffs :
:
-against- :
:
SAMRAT CONTAINER LINES, INC., :
Defendant :

CASE NO. 1:17-cv-01355
(NRB) (JLC)

JOINT PROPOSED
SCHEDULING ORDER

TO THE COURT:

COME NOW Plaintiffs A.P. Møller-Maersk A/S, trading as Maersk Line and Maersk Line A/S (“Maersk”), and Defendant Samrat Container Lines, Inc. (“Samrat”)(Maersk and Samrat collectively “the Parties”), and submit this Joint Proposed Scheduling Order as requested by the Court:

APPEARANCES:

Plaintiffs by: A.P. Møller-Maersk A/S, trading as Maersk Line and Maersk Line A/S
Richard L. Gorman
Richard Gorman Law
12335 Kingsride Ln. #354
Houston, Texas 77024-4116
Telephone: (832) 725-4026
Facsimile: (713) 239-1020
Email: rg@richardgormanlaw.com

Defendant by: Samrat Container Lines, Inc.
J. Stephen Simms
Casey L. Bryant
Simms Showers LLP
201 International Circle, Suite 250
Baltimore, Maryland 21030
Telephone: (410) 783-5795
Facsimile: (410) 510-1789
Email: clbryant@simmsshowers.com

A. Completed by the Parties

Trial: Estimated Trial time is 3 days. This is a non-jury trial.

B. To be completed by the Court

Naomi Reice Buchwald, U.S.D.J.:

It is hereby ordered that:

Pleadings and Parties: Except for good cause shown –

1. No additional parties may be joined after May 4, 2017.
2. No additional causes of action or defenses, except as to new parties that get added and served after the issuance of this Scheduling Order, may be asserted after May 4, 2017. Parties may assert causes of action against a new party within twenty (20) days from the appearance of a new party by way of answer or other responsive pleading. Defenses and counterclaims against a new party shall be governed by the Rules of Civil Procedure.

Discovery: Except for good cause shown, all discovery shall be commenced in time to be completed by November 30, 2017. If service on the third party defendants is not completed by this date, or if additional time is needed because the third party defendants have just appeared, then the parties will seek additional time by means of a joint letter to the court.

Dispositive Motions: Except for good cause shown, no motions shall be filed or heard after December 31, 2017. The parties may satisfy this deadline through the submission of a letter to the Court requesting a pre-motion conference.

Assuming no dispositive motions are made:

Pretrial Order: A joint pretrial order shall be submitted by the _____ day of _____, 2018. The pretrial order shall conform to the Court's instructions.

It shall be accompanied by Memorandum of Law, and proposed findings of act and conclusions of law.

Trial: The parties shall be ready for trial on or after the _____ day of _____, 2018. Estimated trial time is 3 days. A final pretrial conference shall be held on the _____ day of _____, 2018.

The Court is aware that the third party defendants, Safewater Lines (I) Pvt. Ltd. and Safewater Lines India Pvt. Ltd., have to be served in India through the Hague Convention. This could take six(6) months or more. If service on the third party defendants is taking longer than expected, the parties should notify this Court by letter so that the Court can make any necessary adjustments to the schedule. In any event, counsel for Samrat should advise the Court of the status of service on the third party defendants by September 30, 2017.

It is so ORDERED.

DATED: _____
New York, New York

United States District Judge

Respectfully submitted,

Dated: Houston, Texas
April 4, 2017

RICHARD GORMAN LAW

By: /s/ Richard L. Gorman
Richard L. Gorman
12335 Kingsride Ln. #354
Houston, Texas 77024-4116
Telephone: (832) 725-4026
Facsimile: (713) 224-7487
Email: rg@richardgormanlaw.com
Attorney-in-Charge for Plaintiffs

SIMMS SHOWERS LLP

By: /s/ Casey L. Bryant

J. Stephen Simms
Casey L. Bryant
201 International Circle, Suite 250
Baltimore, Maryland 21030
Telephone: (410) 783-5795
Facsimile: (410) 510-1789
Email: clbryant@simmsshowers.com
Attorneys for Defendant

01795-2/proposed.schedule.04/04/17